

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITHOUT PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss without prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41(a)(2). No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Wendy R. Fleishman

Wendy R. Fleishman
Lieff Cabraser
Heimann & Bernstein
250 Hudson Street
8th Floor
New York, NY 10013
(212) 355-9500
wfleishman@lchb.com
Counsel for Plaintiffs

/s/ William M. Gage

William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338

(304) 414-1800
srobinson@tcspllc.com
Counsel for the Ethicon Defendants

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A

Civil Action No.	Case Style
2:12cv08932	Eileen Borkowski and Jeff Borkowski v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13cv11173	Valerie Tuohy-Shutt v. Ethicon, Inc.; Johnson & Johnson
2:13cv11212	Evelyn Sayas and Danilo C. Sayas v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13cv15294	Emily Zaczek-Connors v. Ethicon, Inc.; Johnson & Johnson
2:13cv21054	Felicia A. Jarzyna v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13cv27569	Sheila Marie Baublits and Daniel James Baublits v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13cv30137	Cheryl Ann Mary Dier v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:14cv16285	Laura Eileen Lanz v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:14cv19458	Holly Munson Pierog and John Anthony Pierog v. Ethicon, Inc. and Johnson & Johnson
2:15cv07983	Elizabeth Ivey Wilcox and John Anthony Wilcox, Jr. v. Ethicon, Inc. and Johnson & Johnson
2:15cv13221	Trudie Fagan v. Ethicon, Inc.; Johnson & Johnson
2:16cv02143	Erin Lynn Magnani and Michael Lyle Magnani v. Ethicon, Inc.